

**Before the
Federal Communications Commission
Washington, D.C. 20554**

Schools and Libraries)	
Universal Service)	CC Docket No. 98-67
Support Mechanisms)	

WORLDCom, INC. d/b/a MCI

COMMENTS

WorldCom, Inc., d/b/a MCI, takes this opportunity to respond to Sprint Corporation's ("Sprint") Petition for a Declaratory Ruling (PDR) that its provision of pay-per-call services to callers who access its relay centers by dialing 711 satisfies the Commission's requirement to provide 711 access to relay services. Sprint explains that if a customer dials 711 and requests to access a pay-per-call service, he/she is redirected to dial a special, toll-free, 900 number in order to place such a call. Sprint explains that this is the only way to "harmonize the availability of pay-per-call services through telecommunications relay service (TRS) with the Commission requirement that subscribers be given the ability to block access to pay-per-call services from their lines."¹

MCI supports Sprint's PDR. MCI follows the same procedures when encountering a request to access a pay-per-call service, when a caller has dialed 711 or any 8YY number, to

¹ Sprint Corporation, Petition for Declaratory Ruling, Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, May 27, 2003.

reach its relay centers. MCI's communication assistants (CA) redirect the caller to a special, 900 number, which then allows a caller to connect to pay-per-call services.² MCI implemented this practice so as not to be a conduit for the circumvention of the Commission's various pay-per-call blocking requirements.³ All residential customers are entitled to exercise the option of blocking any access to pay-per-call services from their homes or businesses and have an expectation that their blocking requests will be honored. Such customers expect that such a block will be sufficient to prevent access to pay-per-call services. However, someone using their line could access a 900 number service by accessing relay via 711. Many business customers also place blocks on pay-per-call access to prevent employees from accessing pay-per-call services. These customers would also not be ensured of having their pay-per-call block honored if an employee (even one without a speech or hearing disability) were to access relay via 711.

MCI has not discovered any reliable method of ensuring call blocking for callers who have requested call blocking unless it redirects a relay call made via 711 to its special 900 number. A relay provider might allow a caller to establish a customer profile preventing pay-per-call access. But most relay users do not know in advance that their pay-per-call block, for which they have already paid, could be frustrated because of 711 access. Persons without speech or hearing disabilities would certainly be unaware of the possible need to establish a customer profile with a relay center, in addition to their local exchange carrier (LEC) block, in order to prevent pay-per-call access. Business customers seeking to prevent pay-per-call access by means of a LEC block would also be required to establish customer profiles preventing 900 number

² Callers are not charged for using this 900 number.

³ 47 C.F.R. 1508(a); 47 C.F.R. 1509(b)(2); and 47 C.F.R. 1510(a)(2)(i)(C).

access for every business line to prevent employees from circumventing the pay-per-call block already put in place and paid for. The profile method of preventing 711 access from circumventing the Commission's pay-per-call rules does not automatically guarantee a LEC block will work, and irrationally places the burden of ensuring the viability of a block on the end user.

Moreover, the Commission's rules require common carriers to prohibit access to pay-per-call services by means of any number normally though to be toll-free unless the call is billed to a debit or credit card, rather than the customer's presubscribed line.⁴ Just as TRS providers are required to offer access to all services normally offered by common carriers, they are similarly required to mirror common carriers when common carriers are required to prohibit access to a service.⁵

MCI therefore urges the Commission to adopt Sprint's Petition for Declaratory Ruling.

Sincerely,

Larry Fenster

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⁴ 47 C.F.R. 1504(c)(2).

⁵ 47 C.F.R. 604(a)(3).

Statement of Verification

I have read the foregoing and, to the best of my knowledge, information and belief, there is good ground to support it, and it is not interposed for delay. I verify under penalty of perjury that the foregoing is true and correct.

Executed on September 10, 2003

Larry Fenster

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